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Civil Aviation / Aviation civile  
Aircraft Certification Branch / Certification des aéronefs  
Regulatory Standards/ Normes réglementaires (AARDH)  
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Your file / Votre référence  
FR Doc. 04-3628  
Our file / Notre référence  
AARDD 5009-6-525

October 12th, 2004.

Federal Aviation Administration,  
Transport Airplane Directorate, Aircraft Certification Service,  
Att: Gregg Bartley, ANM-111  
Airplane and Flightcrew Interface Branch  
1601 Lind Avenue SW.,  
Renton, WA 98055-4056  
U.S.A.

FAA - 2004 - 18775 - 11

**Subject: Advisory Circular 25.1329-1A, Automatic Pilot Systems Approval.**

Dear Sir:

Transport Canada (TC) endorses the objectives of the proposed Advisory Circular, with the following comments:

The issue is the definition of a "Significant Transient" that allows for "non-fatal injuries" to crew and passengers. Transport Canada Aircraft Certification feels inclusion of an injury level in certification criteria is inappropriate, open to considerable individual interpretation, and needlessly complicates the issue. Both the rule and the guidance material allow for a significant transient following autopilot disengagement during non-normal (abnormal), and rare-normal events. The more logical approach would be to delete any reference to injury level, and allow for the discretion of the certification specialist to determine whether any transients, be they minor or significant, are acceptable.

Canada

TC wishes to thank the FAA for the opportunity to comment on the subject proposed advisory circular.

Yours truly,

Maher Khouzam  
Chief, Regulatory Standards  
Aircraft Certification